Remarks

Entry of the amendments presented, and reconsideration and withdrawal of the drawings, specification and claim objections, as well as the claims rejection are respectfully requested. Claims 1-15 remain pending.

Initially, Fig. 1 is amended in drawing sheet 1/5 as suggested by the Examiner in the Office Action. In the amendment, the replicated client mail database 103, with the attachment copy agent 111, are shown in phantom since this database and agent are taught by Applicants' specification to be a replication of the client mail database 103 and attachment copy 111 of the receiving server 102. As taught at page 8, lines 14-19, the receiving server 102 includes a client mail database 103 for each client 110. Clients then work with a replication of the client mail database 103 and the attachment copy agent 111, as taught at page 13, line 10 – page 14, line 13. The client mail database 103 includes a view attachment agent as well as the attachment copy agent which allow the client to access the authorized attachment database document in the attachment database 105. Since the client mail database and attachment copy agent are replications, Fig. 1 is amended herein to show the replications in phantom at the client 110. Based on this amendment and the above explanation, withdrawal of the drawings objection is respectfully requested.

With respect to the specification objection, Applicants have herein replaced the "Fig. 2" reference to a reference to "Figs. 2A & 2B", "Fig. 2A" or "Fig. 2B", as appropriate. Figs. 2A & 2B depict one flow chart embodiment of the operation of an attachment handling agent according to one embodiment of the present invention. The flow chart is depicted on two drawing sheets in view of size only. Based upon these amendments, withdrawal of the specification objection is respectfully requested.

With respect to the claims objections, claims 1-13 & 15 are amended herein to delete the reference numbers originally filed with the application. In addition, in amended claims 9 & 10, the "attachment copy device" is replaced by an "attachment copy agent" as suggested. The intermediate receiver language is believed appropriate from the specification wherein the receiving server is intermediate the sender of the E-mail and the client, i.e., the authorized

recipient of the E-mail. Applicants respectfully submit that the exact language need not be repeated in the specification for one of ordinary skill in the art to be able to understand the scope of the claim. This position is well supported by case law. For example, reference Purdue Pharma L.P. v. Faulding, Inc., 230 F.3d 1320, 1323 (C.A. Fed.; 2000); All Dental Prodx. LLC v. Advantage Dental Products, Inc., 309 F.3d 774, 779 (C.A. Fed.; 2002); and Tulip Computers Intern, B.V. v. Dell Computer Corp., 2002 WL 31870574 p. 2 (D. Delaware; 2002). Thus, withdrawal of the claims objections is respectfully requested.

Substantively, original claims 1-15 were rejected under 35 U.S.C. §102(e) as being anticipated by Pollack (U.S. Patent No. 6,505,236). This rejection is respectfully, but most strenuously traversed to any extent deemed applicable to the amended claims presented herewith.

In one aspect, Applicants' invention is a method of handling E-mail messages in a communication system comprising one or several intermediate receivers, each serving at least one recipient (see claim 1). The method includes: detaching at an intermediate receiver an attachment of a received E-mail message and creating an attachment ID for the attachment employing at least one attribute of the attachment. In Applicants' process, an attachment database is then referenced to determine whether an existing attachment database document has a same attachment ID. If not, then a new attachment database document is created in the attachment database. This new attachment database document includes the attachment ID and the E-mail message attachment. The intended recipients of the E-mail message are then authorized to access the new attachment database document, and the attachment in the E-mail message is replaced with a reference to the new attachment database document. The E-mail message is then forwarded with this reference from the intermediate receiver to each authorized recipient specified in the E-mail message.

In Applicants' approach, only authorized recipients have access to the new attachment database document in the attachment database. Support for the amended independent claim language can be found throughout the specification as filed. For example, reference Figs. 2A & 2B and the supporting discussion thereof at pages 9-12 of the specification. No new matter is believed added to the application by any amendment presented. Applicants' process for authorizing only intended recipients of the E-mail message to access the new attachment

database document is discussed, for example, at page 11 wherein an Access Control List (ACL) is one example of an authorization structure. As another example, an appropriate authorization entry in an authorization database can be created.

It is well settled that there is no anticipation of a claim unless a single prior art reference discloses: (1) all the same elements of the claimed invention; (2) found in the same situation as the claimed invention; (3) united in the same way as the claimed invention; and (4) in order to perform the identical function as the claimed invention. In this instance, Pollack fails to disclose various aspects of Applicants' invention as recited in the independent claims presented, and as a result, does not anticipate (or even render obvious) Applicants' invention.

Pollack describes a network-based mail attachment storage system and method which includes: receiving from a sender an electronic mail item which contains a forwarding specification and an attachment; detaching the attachment from the electronic mail item; storing the attachment on a storage device at a specific address under a specific file name; generating a handle corresponding to the specific address and the specific file name; appending the electronic mail item to include the handle; and transmitting in accordance with the forwarding specification the appended electronic mail item, including the handle, but excluding the stored attachment. (See abstract.)

Initially, Applicants respectfully submit that Pollack does not teach or suggest their recited process of creating an attachment ID for the attachment employing at least one attribute of the attachment (see page 10 of Applicants' specification). Pollack describes creation of a handle which corresponds to the specific address and the specific file name where the attachment is placed in the storage device. There is no discussion or suggestion that the handle of Pollack is based on one or more attributes of the attachment itself. This difference is significant since basing the attachment ID on one or more attributes of the attachment allows Applicants to differentiate between versions of an attachment and allows one or more authorized recipients to have access to multiple versions of an attachment in the attachment database.

Further, Applicants' independent claims recite referencing the attachment database to determine whether an existing attachment database document has the same attachment ID. If not, then a new attachment database document is created in the attachment database. This new attachment database document includes the attachment ID and the E-mail message attachment. Thus, in Applicants' processing, logic is presented for minimizing duplication of attachment database documents in the attachment database. A careful reading of Pollack fails to uncover any discussion of similar processing.

Still further, Applicants' independent claims recite authorizing the intended recipients of an E-mail message to access the new attachment database document. This is significant. In Applicants' database approach, logic is provided for ensuring that only the intended recipients of the E-mail message are authorized to access the attachment database document in the attachment database. In contrast, Pollack describes an approach wherein a handle is attached to the E-mail message, which is then used to access the attachment by any receiving entity. There is no discussion in Pollack of any authorization scheme for ensuring that only intended recipients of the E-mail message have access to the stored attachment document. In Applicants' claimed process, a logical attachment database is employed to coordinate the storing and authorized accessing of E-mail attachments. Pollack fails to disclose any teaching or suggestion of a similar process for protecting against unauthorized access to E-mail attachments. In Pollack, the handle is a URL, which allows access by any entity to the attachments, even if that entity is an unintended recipient.

For all of the above reasons, Applicants respectfully submit that amended independent claims 1, 6 & 15 patentably distinguish over the teachings of Pollack. Reconsideration and withdrawal of the anticipation rejection based thereon is therefore respectfully requested.

The dependent claims are believed patentable for the same reasons as the independent claims from which they directly or ultimately depend, as well as for their own additional characterizations.

Should the Examiner wish to discuss this application further with Applicants' attorney, the Examiner is invited to telephone their below-listed representative.

Respectfully submitted,

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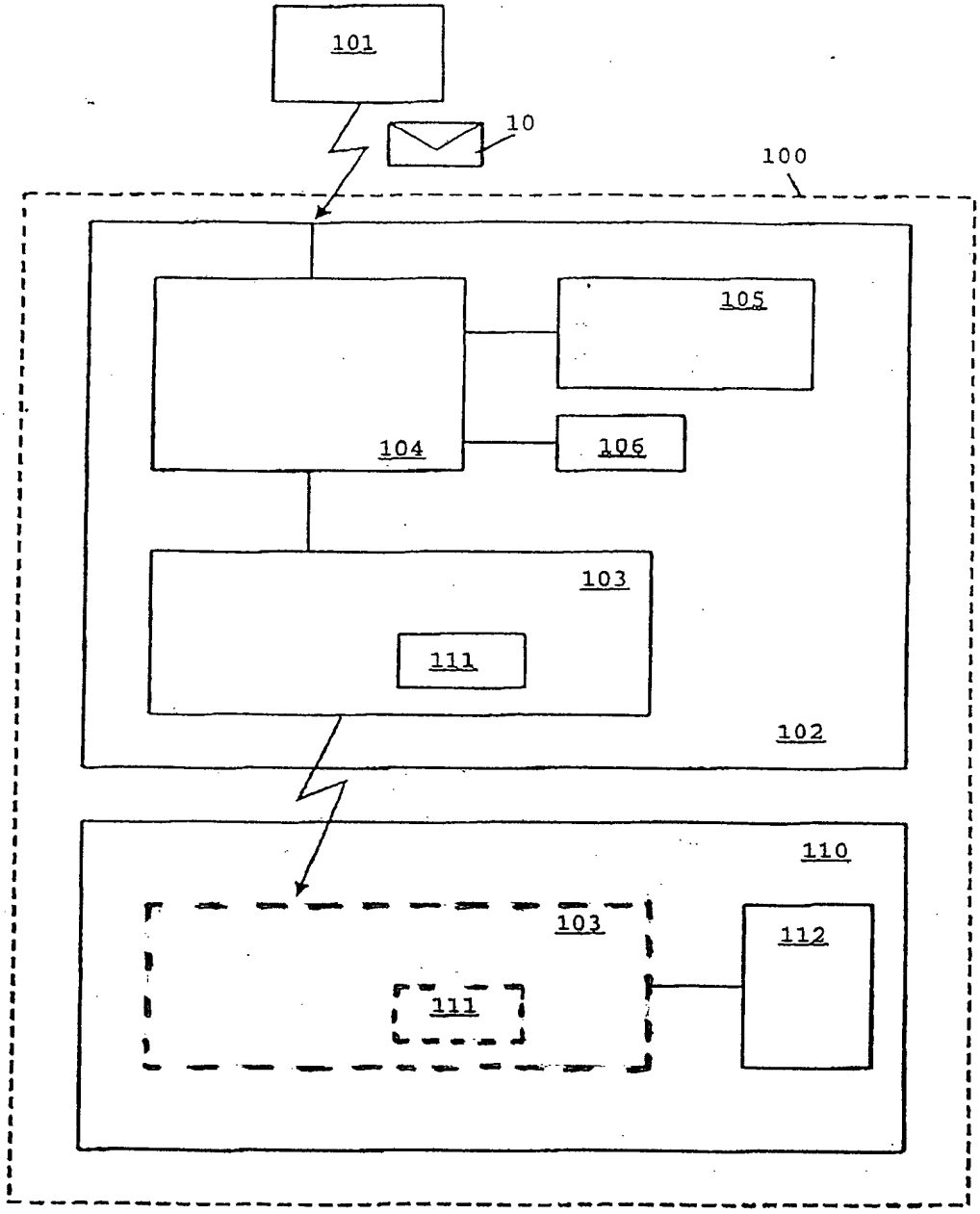

FIG. 1